

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'07 CR 3246 DMS

UNITED STATES OF AMERICA,)	Criminal Case No. _____
)	
Plaintiff,)	<u>I N F O R M A T I O N</u>
)	
v.)	Title 18, U.S.C., Sec. 1014 -
)	False Statements on Loan
BENJAMIN LEON COLEMAN)	Applications; Title 42, U.S.C.,
aka Benjamin Rhone,)	Sec. 408(a)(7)(B)- False Use of
)	Social Security Account Number;
)	Title 18, U.S.C., Sec. 1028A(a)(1)
Defendant.)	- Aggravated Identity Theft; Title
)	26, United States Code, Section
)	7201 - Income Tax Evasion

The United States Attorney charges:

Count 1

[18 U.S.C. §1014]

On or about June 2, 2005, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Bank of America, the accounts of which are insured by the Federal Deposit Insurance Corporation, upon an application for a line of credit for Advance Service Management, Inc., by falsely stating, among other things, that Advance Service Management, Inc., had revenue of \$2 million dollars and 12 employees when, in fact, it had no revenue and no employees, causing loss to Bank of America in the amount of \$51,187.14; in violation of Title 18, United States Code, Section 1014.

Count 2

[18 U.S.C. §1014]

In or about September, 2005, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Capital One F.S.B., the accounts of which are insured by the Federal Deposit Insurance Corporation, upon an application for a credit card in the name of Vaughn Parker d/b/a Advance Service Management, Inc., by falsely representing the applicant to be Vaughn Parker and falsely representing the financial condition of Advance Service Management, Inc., causing loss to Capital One F.S.B. in the amount of \$48,385.83; in violation of Title 18, United States Code, Section 1014.

Count 3

[18 U.S.C. §1014]

In or about December 2005, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Advanta Bank Corporation, the accounts of which are insured by the Federal Deposit Insurance Corporation, upon an application for a credit card in the name of Vaughn Parker d/b/a New Century Business by falsely representing the applicant to be Vaughn Parker and falsely representing the financial condition of New Century Business, causing loss to Advanta Bank Corporation in the amount of \$18,714.68; in violation of Title 18, United States Code, Section 1014.

Count 4

[18 U.S.C. §1014]

On or about March 6, 2006, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Bank of America, the accounts of which are insured by the Federal Deposit Insurance Corporation, upon an application for a line of credit for ACC Enterprises, Inc., d/b/a ACC Management Group by falsely representing the applicant to be Anthony Coleman and by falsely stating, among other things, that ACC Enterprises, Inc., had revenue of \$745,000 and 6-10 employees when, in fact, it had no revenue and no employees, causing loss to Bank of America in the amount of \$71,432.67; in violation of Title 18, United States Code, Section 1014.

Count 5

[18 U.S.C. §1014]

In or about March 2006, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Bank of America, the accounts of which are insured by the Federal Deposit Insurance Corporation, upon an application for a credit card in the name of Anthony Coleman d/b/a ACC Enterprises, Inc., by falsely representing the applicant to be Anthony Coleman and falsely representing the financial condition of ACC Enterprise, Inc., causing loss to Bank of America in the amount of \$14,887.38; in violation of Title 18, United States Code, Section 1014.

Count 6

[18 U.S.C. §1014]

On or about June 20, 2006, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of First USA/Chase Bank, the accounts of which are insured by the Federal Deposit Insurance Corporation, upon an application for a credit card in the name of Benjamin Rhone, by falsely representing that the social security account number provided in support of the application was the social security account number assigned to Benjamin Rhone and falsely representing the employment and salary of the applicant, causing loss to First USA/Chase Bank in the amount of \$3,140.48; in violation of Title 18, United States Code, Section 1014.

Count 7

[18 U.S.C. §1014]

On or about August 14, 2006, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of First USA/Chase Bank, the accounts of which are insured by the Federal Deposit Insurance Corporation, upon an application for a credit card in the name of Benjamin Rhone, by falsely representing that the social security account number provided in support of the application was the social security account number assigned to Benjamin Rhone and falsely representing the employment and salary of the applicant, causing loss to First USA/Chase Bank in the amount of \$8,993.43; in violation of Title 18, United States Code, Section 1014.

Count 8

[18 U.S.C. §1014]

On or about October 27, 2006, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Navy Federal Credit Union, a Federal credit union, upon an application for a line of credit in the name of Benjamin Rhone, by falsely representing that the social security account number provided in support of the application was the social security account number assigned to Benjamin Rhone and misrepresenting his employment and salary, causing loss to Navy Federal Credit Union in the amount of \$28,687.62; in violation of Title 18, United States Code, Section 1014.

Count 9

[18 U.S.C. §1014]

On or about January 19, 2007, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Navy Federal Credit Union, a Federal credit union, upon an application for a credit card in the name of Benjamin Rhone, by falsely representing that the social security account number provided in support of the application was the social security account number assigned to Benjamin Rhone and misrepresenting his employment and salary, causing loss to Navy Federal Credit Union in the amount of \$25,187.65; in violation of Title 18, United States Code, Section 1014.

Count 10

[18 U.S.C. §1014]

On or about January 19, 2007, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, knowingly made false material statements for the purpose of influencing the actions of Navy Federal Credit Union, a Federal credit union, upon an application for a line of credit in the name of Benjamin Rhone, by falsely representing that the social security account number provided in support of the application was the social security account number assigned to Benjamin Rhone and misrepresenting his employment and salary, causing loss to Navy Federal Credit Union in the amount of \$20,126.03; in violation of Title 18, United States Code, Section 1014.

Count 11

[42 U.S.C. §408(a)(7)(B)]

On or about January 19, 2007, in the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, for the purpose of receiving something of value, knowingly and with intent to deceive falsely represented a number to be the social security account number assigned by the Commissioner of Social Security to him or to Benjamin Rhone when, in fact, as the defendant knew, such number was not the number assigned by the Commissioner of Social Security to him or to Benjamin Rhone, in connection with an application for a line of credit in the name of Benjamin Rhone to Navy Federal Credit Union; in violation of Title 42, United States Code, Section 408(a)(7)(B).

Count 12

[18 U.S.C. §1028A(a)(1)]

On or about September 2005, within the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, during and in relation to a felony violation of Title 18, United States Code, Section 1014, as charged in Count 2 above, knowingly used, without lawful authority, a means of identification of another person, to wit, the name and social security account number of Vaughn Parker; in violation of Title 18, United States Code, Section 1028A(a)(1).

Count 13

[26 U.S.C. §7201]

On or about April 15, 2006, within the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, well knowing and believing that during the 2005 calendar year defendant had substantial taxable income on which a substantial tax, imposed by the provisions of Title 26 of the United States Code, was due and owing to the United States, did willfully and affirmatively attempt to evade and defeat the income tax due and owing by, among other things, committing the following acts of evasion, designed to conceal from and mislead proper officers of the United States as to defendant's true and correct income and taxes due thereon:

1. During the calendar year 2005, defendant received approximately \$111,714 in loan proceeds obtained in the name of various shell corporations and persons other than the defendant using materially false statements on loan applications which funds were used by the defendant to pay personal expenses.

All in violation of Title 26, United States Code, Section 7201.

Count 14

[26 U.S.C. §7201]

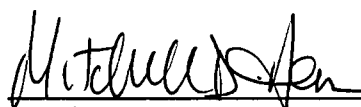
On or about April 15, 2007, within the Southern District of California, defendant BENJAMIN LEON COLEMAN aka Benjamin Rhone, well knowing and believing that during the 2006 calendar year defendant had substantial taxable income on which a substantial tax, imposed by the provisions of Title 26 of the United States Code, was due and owing to the United States, did willfully and affirmatively attempt to evade and defeat the income tax due and owing by, among other things, committing the following acts of evasion, designed to conceal from and mislead proper officers of the United States as to defendant's true and correct income and taxes due thereon:

1. During the calendar year 2006, defendant received approximately \$116,625 in loan proceeds obtained in the name of various shell corporations and persons other than the defendant using materially false statements on loan applications which funds were used by the defendant to pay personal expenses.

All in violation of Title 26, United States Code, Section 7201.

DATED: December 3, 2007

KAREN P. HEWITT
United States Attorney


MITCHELL D. DEMBIN
Assistant U. S. Attorney